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Jesse M. Furman, U.S.D.J.
Southern District of New York
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New York, NY 10007
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April 27, 2023

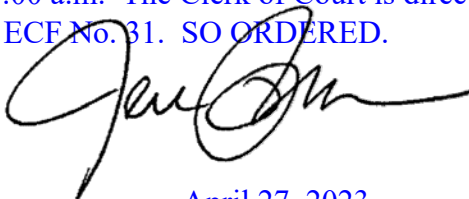
Dear Judge Furman,

I write in accordance with your Individual Rule 2.E. to request a 30-day extension to complete fact discovery. This would make the new fact discovery deadline June 15, 2023. The original deadline to complete fact discovery was March 17, 2023. There has been one previous 60-day extension request to complete fact discovery. That request was granted making the new deadline to complete fact discovery May 16, 2023.

This request is being made because Plaintiff's deposition was supposed to be taken on April 26, 2023, followed by Defendant's 30(b)(6) deposition on May 1, 2023. Unfortunately, I got sick and was unable to attend Plaintiff's deposition. Defendant's counsel kindly agreed to postpone Plaintiff's deposition. Because Defendant's counsel requested that Defendant's deposition follow Plaintiff's deposition, it was agreed that Defendant's deposition would also be postponed. Defendant's designated 30(b)(6) witness next availability to be deposed is after the current fact discovery deadline ends, thus the parties request a 30-day extension.

Defendant consents to this request. There is currently a pretrial conference scheduled for May 18, 2023, at 9:00 a.m.

Application GRANTED. No further extensions will be granted. This does not affect the deadline for expert discovery, which is **July 1, 2023**, see ECF No. 30. The pretrial conference scheduled for May 18, 2023, is hereby ADJOURNED to **June 29, 2023**, at 9:00 a.m. The Clerk of Court is directed to terminate ECF No. 31. SO ORDERED.



April 27, 2023

Thank you,

s/Shimshon Wexler/